

Madison Liquidity Investors
6310 Lamar Ave. Suite 120
Overland Park, Kansas 66020
Phone 913-982-5011

Date: March 10, 2010

Honorable Robert D Drain, US Bankruptcy Judge
US Bankruptcy Court, Southern District of New York
One Bowling Green, 5th Floor
New York, NY 10004-1408

In Re: DPH Holdings Corp.
Chapter 11 Case No: 05-44481

RESPONSE TO: NOTICE OF OBJECTION TO CLAIM - FORTY-FOURTH OMNIBUS

Party in Interest: Madison Investment Trust Series 38
6310 Lamar Ave. Suite120
Overland Park, Kansas 66202

“Scheduled Amount”: \$51,735.60 – United Metal Products Corp.

Partially Satisfied Scheduled Amount: \$50,098.30

Madison Investment Trust Series 38 is hereby filing our initial response, dated March 10, 2010, to the Notice of Objection to Claim regarding Partially Satisfied Scheduled Liabilities in the amount of \$50,098.30. Pursuant to an Evidence of Transfer of Claim filed with this court on February 14, 2007, Docket number 6955, the Scheduled Claim in the amount of \$51,735.60 was sold, transferred and assigned to Madison Investment Trust Series 38 from United Metal Products Corp. As a result of the transfer of claim, Madison is entitled to any and all rights and distributions in respect to the Scheduled Claim.

Madison objects to the Debtor’s assertion that it has partially satisfied the Scheduled Claim since Madison Investment Trust Series 38 has received no distributions as stated in the Forty-Fourth Omnibus Objection and Notice of Objection to Claim.

Respectfully submitted,

Kristy Stark

Kristy Stark
Clearing Operations Manager
MADISON LIQUIDITY INVESTORS LLC

U.S. BANKRUPTCY COURT
FILED
2010 MAR 15 PM 11
S.D.N.Y.

cc: DPH Holdings Corp

Madison Liquidity Investors LLC, Meagher & Flom LLP (J Butler Jr., J. Lyons & J.Wharton)
6310 Lamar Avenue, Suite 120
Overland Park, Kansas 66202
Phone: 913.982.5000
Fax: 913.982.5039